

U.S. Department of Justice

United States Attorney Eastern District of New York

AG/MPR F. #2009R01065 271 Cadman Plaza East Brooklyn, New York 11201

August 11, 2017

By Hand and ECF

Michelle A. Gelernt, Esq. Michael Schneider, Esq. Edward Zas, Esq. Federal Defenders of New York One Pierrepont Plaza, 16th Floor Brooklyn, NY 11201

Re: United States v. Joaquin Archivaldo Guzman Loera

Criminal Docket No. 09-466 (S-4) (BMC)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production includes material that is marked "Protected Material" and is subject to the terms of the Court's April 3, 2017 Protective Order. See Dkt. No. 57. The government is also producing draft transcripts pursuant to the March 8, 2017 signed stipulation between the parties. This supplements discovery previously provided on March 8, 2017, April 10, 2017, May 5, 2017, June 7, 2017 and July 21, 2017. The government will continue to produce discovery on an ongoing basis. The government also requests reciprocal discovery from the defendant.

I. <u>The Government's Discovery</u>

Bates-stamped numbers Description

0000008143 – 0000013551 Documents related to drug and weapons

seizures, including photographs, scientific reports, and drug ledgers; various applications and court orders; requests for legal assistance to foreign countries;

ledgers

$\begin{array}{c} 0000013552 - 0000013606 \\ 0000013621 - 0000014251 \end{array}$	Wire and electronic interceptions and accompanying draft transcripts
0000013607 - 0000013620	Intentionally left blank
0000014252 - 0000020920	Recorded electronic communications, including communications of the defendant, and accompanying draft transcripts
0000020921 - 0000029806	Electronic interceptions, including communications of the defendant, and accompanying draft transcripts
0000029807 - 0000030022	Documents related to drug seizures, including photographs and scientific reports
0000030023 - 0000030025	Video of defendant
0000030026 - 0000030867	Wire and electronic interceptions and accompanying draft transcripts

Additionally, on July 21, 2017, the government made available certain material at its office, specifically videos Bates-stamped number 0000008135 thru 0000008142. These

items have been included in this production pursuant to the written understanding between the parties dated August 8, 2017.

Very truly yours,

BRIDGET M. ROHDE ACTING UNITED STATES ATTORNEY Eastern District of New York 271 Cadman Plaza East Brooklyn, New York 11201

ARTHUR G. WYATT, CHIEF Narcotic and Dangerous Drug Section Criminal Division, U.S. Department of Justice

OF COUNSEL:

BENJAMIN J. GREENBERG ACTING UNITED STATES ATTORNEY Southern District of Florida

Enclosures

cc: Clerk of the Court (BMC) (by ECF) (without enclosures)